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April 16, 2014

**VIA CM/ECF**

Honorable Judge Edgardo Ramos  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Suarez v. Jennifer Convertibles Inc.  
1:14-CV-02050-ER**

Dear Judge Ramos,

This firm represents Plaintiff, Francisco Suarez, and Opt in Plaintiffs, Erik Ramos and Taiyannis Brown (collectively “Plaintiffs”). The Complaint was filed on behalf of Plaintiffs and similarly situated employees on March 24, 2014. In their Complaint, Plaintiffs alleged claims for unpaid wages pursuant to the Fair Labor Standards Act and the New York Labor Law on behalf of themselves and a class of similarly situated employees. The Complaint was served on Defendant on March 30, 2014. As a result, a response to the Complaint is due on April 21, 2014.

Last week, Plaintiffs’ counsel was contacted by defense counsel who expressed an interest in resolving Plaintiffs’ claims, and possibly the claims of the putative class members. Doing so will require an exchange of a significant number of documents, which will have to be reviewed before the parties can intelligently discuss settlement. Based on the significant time (and money) the parties will have to use to get through this process, Defendant has indicated that it needs an extension of time to respond to the Complaint to permit the parties to put their resources toward resolution of the case. Plaintiffs have no objection to a twenty (20) day

extension of time through and including May 12, 2014 for Defendant to respond to the Complaint.

No extension of time has ever been requested to respond to the Complaint in this case. This request will not affect any deadlines in this case.

Respectfully submitted,

s/ Jodi J. Jaffe